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19 COMMONWEALTH LAND TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 HSBC BANK USA, N.A.,

28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

Defendants.

Case No.: 2:20-CV-02280-RFB-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT (ECF No. 1)**

**(FIRST REQUEST)**

COMES NOW defendant Commonwealth Land Title Insurance Company  
("Commonwealth") and plaintiff HSBC Bank USA, N.A. ("HSBC"), by and through their  
respective attorneys of record, which hereby agree and stipulate as follows:

1. On December 16, 2020 HSBC filed its complaint in the Eighth Judicial District  
Court for the State of Nevada;

2. On December 16, 2020, Commonwealth removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);

3. On January 11, 2021, HSBC served its complaint on Commonwealth;

4. Commonwealth's response to HSBC's complaint is currently due on Monday, February 1, 2021;

5. Counsel for Defendants request a 30-day extension until Wednesday, March 3, 2021 for Commonwealth to file its response to HSBC's complaint to afford Commonwealth's counsel additional time to review and respond to HSBC's complaint.

6. Counsel for HSBC does not oppose the requested extension;

7. This is the first request for an extension made by counsel for Commonwealth, which is made in good faith and not for the purposes of delay.

8. This stipulation is entered into without waiving any of Commonwealth's objections under Fed. R. Civ. P. 12.

**IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the complaint is hereby extended through and including March 3, 2021.

Dated: January 29, 2021

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendant  
COMMONWEALTH LAND TITLE  
INSURANCE COMPANY

Dated: January 29, 2021

WRIGHT FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner  
DARRENT T. BRENNER  
Attorneys for Plaintiff  
HSBC BANK USA, N.A.

ORDER

**IT IS SO ORDERED**

**DATED:** 12:00 pm, February 01, 2021

**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**